BURGER GREEN & MIN LLP

Barbara Burger Nancy Green Richard Min Michael Banuchis Robert Arenstein, Of Counsel Brooke Camhi, Of Counsel 420 Lexington Avenue Suite 2834 New York, New York 10170 T. 212.681.6400 F. 212.681.6999 www.bgmlaw-nyc.com

June 6, 2019

Via ECF

Honorable Raymond J. Dearie United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Porretti v. Baez

Case No. 19-cv-1955

Dear Judge Dearie,

I represent Respondent, Yanira Baez, in the above-referenced matter. I submit this joint letter on behalf of both parties, with the consent of Respondent's counsel, Mr. Ross, respectfully requesting an adjournment of tomorrow's conference at 2:30pm.

As we discussed at our last court appearance, the parties and their respective counsel have been working to produce and translate numerous documents from Mexico. Mr. Ross and I spoke earlier today and we both agreed that we needed additional time to get all of the documents we need. We also discussed meeting to avoid duplications of translations, which are costly for our clients.

We are therefore requesting that tomorrow's conference be adjourned, in order not to waste the court's time, and that a telephone conference be scheduled in the near future so we can inform the court as to our continued progress.

Thank you for your consideration and courtesy in this matter. We remain available if the Court would like any further conversation on this issue.

Respectfully Submitted,

Richard Min

Richard Min, Esq.